

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**NOVEMBER 2012 GRAND JURY
(Impaneled 11/9/12)**

THE UNITED STATES OF AMERICA INDICTMENT

-vs-

STACY SAMUELS

Violations:

Title 21, United States Code,
Sections 841(a)(1), 846, and 963
(4 Counts)

COUNT 1

**(Conspiracy to Possess with Intent to Distribute,
and to Distribute, 500 Grams or More of Methamphetamine)**

The Grand Jury Charges That:

Between in or about 2014, the exact date being unknown, and on or about April 7, 2014, in the Western District of New York, and elsewhere, the defendant, STACY SAMUELS, did knowingly, willfully, and unlawfully combine, conspire, and agree with others, known and unknown, to commit the following offenses, that is, to possess with the intent to distribute, and to distribute, five hundred (500) grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Conspiracy to Export 500 Grams or More of Methamphetamine)

The Grand Jury Further Charges That:

Between in or about 2014, the exact date being unknown, and on or about April 7, 2014, in the Western District of New York, and elsewhere, the defendant, STACY SAMUELS, did knowingly, willfully, and unlawfully combine, conspire, and agree with others, known and unknown, to commit the following offense, that is, to export from the United States to a place outside the United States, that is, Canada, five hundred (500) grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 953(c), 960(a)(1), and 960(b)(1)(H).

All in violation of Title 21, United States Code, Section 963.

COUNT 3

(Possession With Intent to Distribute, and Distribution of, Methamphetamine)

The Grand Jury Further Charges That:

On or about March 20, 2014, in the Western District of New York, the defendant, STACY SAMUELS, did knowingly, intentionally, and unlawfully possess with the intent to distribute, and distribute, five hundred (500) grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 4

(Attempt to Export 500 Grams or More of Methamphetamine)

The Grand Jury Further Charges That:

On or about March 20, 2014, in the Western District of New York, and elsewhere, the defendant, STACY SAMUELS, did knowingly, intentionally, and unlawfully attempt to export from the United States to a place outside the United States, that is, Canada, five hundred (500) grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 953(c), 960(a)(1), and 960(b)(1)(H).

All in violation of Title 21, United States Code, Section 963.

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of any the controlled substance offenses alleged in Counts 1 through 4 of this Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any and all property used, and intended to be used, in any manner or part, to commit or to facilitate the commission of said violations, including, but not limited to the following:

CURRENCY:

- a. The sum of Three thousand, five hundred (\$3,500.00) dollars United States currency.

VEHICLES:

- a. One 2008 Mazda CX, bearing Ontario plate BSMM092, registered to Monkey Business, Ltd., and silver in color as observed by law enforcement on March 20, 2014 at Rainbow Bridge Port of Entry, Niagara Falls, New York; and
- b. One 2003 Hyundai Tiberon, bearing Ontario plate BSNE867, registered to Monkey Business, Ltd., and blue in color as observed by law enforcement on March 20, 2014 at Rainbow Bridge Port of Entry, Niagara Falls, New York.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

It is the intention of the United States to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 21 United States Code, Sections 853(a)(1), (a)(2) and (p).

DATED: Buffalo, New York, May 7, 2014.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON